

August 11, 2025

***VIA ECF***

The Honorable Paul G. Gardephe  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

***Re: American Civil Liberties Union v. U.S. Department of Homeland Security, et al., No. 1:20-cv-10083-PGG***

Dear Judge Gardephe,

Pursuant to this Court's Order of June 30, 2025, ECF No. 61, in the above-referenced Freedom of Information Act ("FOIA") case seeking records related to the defendant agencies' purchase of cell-phone location data for immigration enforcement and other purposes, we write, jointly with counsel for Defendants, to provide this Court an update on the progress of this case.

Since the last joint status update letter filed on June 27, 2025, ECF No. 60, Defendants have reviewed Plaintiff's settlement proposal regarding attorneys' fees and costs. Defendants asked Plaintiff for more information regarding Plaintiff's time records, which Plaintiff provided. Defendants' internal deliberations regarding a counterproposal are ongoing.

The parties will continue to work diligently to attempt to reach an agreement on attorneys' fees and costs. To allow the parties sufficient time to meet and confer to determine if they can resolve Plaintiff's claim for fees and costs consensually, we request leave from the Court to file a further status update letter on September 25, 2025.

Respectfully submitted,

/s/ Lauren Yu

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